



CODE OF CONDUCT

FOR THE PREVENTION OF SEXUAL EXPLOITATION AND ABUSE

Every μαμαγαία / mamagea AMKE personnel (staff, intern, volunteer) and co-operating contractor or supplier will treat all persons equally without distinction whatsoever of race, gender, religion, color, national or ethnic origin, language, marital status, sexual orientation, age, socio-economic status, disability, political conviction, or any other distinguishing feature in accordance with applicable international and national conventions and standards of behavior.

Μαμαγαία / mamagea AMKE has implemented the Code of Conduct for the Prevention of Sexual Exploitation and Abuse and has set in place a mechanism for managing and dealing with any case of inappropriate sexual behavior and any act of sexual exploitation and abuse (SEA) or attempt of those acts by any Μαμαγαία / mamagea AMKE employee, volunteer, member of the Board, supplier or contractor against any μαμαγαία / mamagea AMKE beneficiary.

The Code of conduct applies to all μαμαγαία / mamagea AMKE staff, regular full - and part-time staff, staff on permanent or temporary employment, interns, contractors, consultants, experts, service providers, partner organizations, volunteers and Board Members. The Code of conduct both applies during and outside working hours.

All μαμαγαία / mamagea AMKE staff (as described in the above paragraph) recognize that certain international standards of behavior must be upheld and that they take precedence over local and national cultural practices. While respecting and adhering to these broader frameworks of behavior, μαμαγαία / mamagea AMKE specifically requires that all personnel and related entities (as described in the above paragraph) adhere to the following Code of Conduct:

A. Definitions:

Sexual Exploitation: Any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual abuse: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Harassment: any unwelcome sexual advance, request for sexual favor, verbal or physical conduct of gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment.

Sexual Violence: is a form of gender-based violence. It encompasses acts of a sexual nature against one or more persons or that cause such person or persons to engage in an act of a sexual nature by force, or by threat of force or coercion, such as that caused by fear of violence, duress, detention, psychological oppression or abuse of

power, against such person or persons or another person, or by taking advantage of a coercive environment or such person's or persons' incapacity to give genuine consent. Forms of sexual violence include, inter alia, rape and attempted rape, forced prostitution, sexual exploitation and abuse, trafficking for the purpose of sexual exploitation, child pornography, child prostitution, sexual slavery, forced marriage, forced pregnancy, forced abortion, forced sterilization, forced nudity, forced virginity testing, sexual torture and sexual mutilation.

Gender-Based Violence: is violence directed toward or disproportionately affecting someone because of their gender or sex. Such violence takes multiple forms, including acts or omissions intended or likely to cause or result in death or physical, sexual, psychological or economic harm or suffering, threats of such acts, harassment, coercion and arbitrary deprivation of liberty. Examples include sexual violence, trafficking, domestic violence, battery, coerced or forced use of contraceptives, violence against LGBTI people, femicide, female infanticide, harmful practices and certain forms of slavery and servitude.

B. Code of Conduct for the Prevention of Sexual Exploitation and Abuse

1. μαμαγαία / mamagea AMKE personnel and related entities are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of the Code of Conduct. μαμαγαία / mamagea AMKE personnel will not condone or participate in corrupt or illegal activities.
2. Sexual exploitation and abuse by μαμαγαία / mamagea AMKE worker constitute act of serious disciplinary offenses and misconduct and, as such, constitute grounds for termination of the collaboration with μαμαγαία / mamagea AMKE.
3. μαμαγαία / mamagea AMKE personnel and related entities will never exploit a beneficiary (including a child) and will never verbally, physically, sexually or psychologically abuse or commit any other form of abuse against a beneficiary.
4. Any form of sexual activities with a person under the age of 18 are strictly forbidden regardless of the age of consent, local customs or the law in effect. No one may invoke as an excuse a false impression or record of age.
5. All service providers (let it be personnel, related entities or contract providers) recognize that any sexual relationship with a person benefitting from their services that involves abuse of power, or position, undermines the credibility of their work and the work of μαμαγαία / mamagea AMKE and severely damages victims of these exploitative acts, their families and communities.
6. Withholding assistance, giving preferential treatment including requests/demands for sexual favors or acts, exchange of money, employment, goods or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is strictly prohibited.
7. Every μαμαγαία / mamagea AMKE worker during the first month of their admission to the organization, has the obligation to complete a free e-learning course on the Prevention of Sexual Exploitation and Abuse

(<https://agora.unicef.org/course/info.php?id=7380>). If a worker has accessibility or any other issues, the organization should provide assistance.

8. It is expected of all μαμαγαία / mamagea AMKE personnel and related entities to uphold the highest ethical standard of integrity, accountability and transparency in the delivery of goods and services while executing the responsibilities of their position.

9. Every μαμαγαία / mamagea AMKE personnel and related entity has the responsibility to report any known or suspected cases of alleged misconduct against beneficiaries immediately as following:

a) directly to the PSEA focal person. As PSEA focal person is appointed Periklis Chatzinakos.

b) electronically by sending an e-mail to: info@mamagea.gr.

10. All relevant reports shall be treated with confidentiality. The identity of any individual or body reporting possible incidents of sexual exploitation and abuse is confidential, in order to protect them from any acts of retaliation.

11. The PSEA focal person serves both as a primary body for reporting and for investigating those incidents, in collaboration with the Senior Management of the organization.

12. μαμαγαία / mamagea AMKE has a process for investigating SEA allegations in place and shall properly and promptly conduct the investigation of any SEA allegation committed by its employees or associated personnel or refer to the appropriate investigative body if the perpetrator is affiliated with another entity. The procedures for investigations management and process, is detailed in a separate document.

As specified in the standard Partnership Cooperation Agreements signed between CSOs and UNICEF, partners should keep UNICEF informed during the conduct of the investigation, without prejudice to the due process rights of any persons concerned.

Partners should confidentially share this information with the relevant UNICEF PSEA Focal Point, (Programme Officer, Sokratis Vlachakis, svlachakis@unicef.org) UNICEF Head of Office in Country, (Ghassan Khalil, gkhalil@unicef.org), and upon consultation with the PSEA Focal Point, with the UNICEF Director, Office of Internal Audit and Investigation (integrity1@unicef.org) in a manner that assures the safety of all involved.

13. μαμαγαία / mamagea AMKE is committed to ensure that any victims of SEA has access to assistance and support as soon as information about an allegation is received, regardless of (i) the μαμαγαία / mamagea AMKE decision to investigate the case, (ii) the outcome of the investigation and (iii) irrespective of whether the victim cooperates with an investigation or any other accountability procedure.

14. Assistance and support shall be provided by skilled and competent service providers in line with the “do no harm” and victim-centered approach, in full respect of the rights and best interests of victims and with respect to Gender-Based Violence key principles, especially informed consent. Services shall be rights-based, age,



disability-and gender sensitive, non-discriminatory and culturally appropriate and ensure the best interest of the child. Support and assistance shall entail:

- Provision of safety measures to protect against retaliation
- Services including, without being limited to: immediate medical and health care, mental health and psychosocial support, legal services, basic material assistance (if needed) and support to children born as a result of SEA.
- To do this, the Organization has to communicate with the relevant hotlines as appropriate:

<https://www.hamogelo.gr/gr/el/sos-1056/>

<https://womensos.gr/en/15900-24ori-tilefoniki-grammi-2/>

I hereby acknowledge having received a copy of the Code of Conduct for Sexual Exploitation and Abuse, and having read, understand and agree to comply with.

I understand what is expected of me and that my behavior must align with μαμαγαία / mamagea AMKE Code of Conduct.

I understand that violating any provision of the Code may result in disciplinary measures, including my dismissal from or the termination of my contractual relationship with μαμαγαία / mamagea AMKE.

Lastly, I understand that there could be civil and/or criminal proceedings in the event of a breach of the law.

Full name: Periklis Chatzinakos

Place: Thessaloniki

Date: 12/09/2025

Signature:



μαμαγαία / mamagea
ΑΣΤΙΚΗ ΜΗ ΚΕΡΔΟΣΚΟΡΙΚΗ ΕΤΑΙΡΕΙΑ
ΑΛ. ΞΕΝΟΓΥ 45 | 546211 ΘΕΣΣΑΛΟΝΙΚΗ
ΚΗΤ: 2310 226307 | ΑΦΜ: 090225861
Δ' ΔΟΥ ΘΕΣΣΑΛΟΝΙΚΗΣ



ANNEX 1

Investigative Procedures

UNICEF requires its partners to “properly and without delay investigate allegations of sexual exploitation and abuse ... by (their) employees, personnel, or subcontractors.” Sexual exploitation and abuse (SEA) by μαμαγαία / mamagea AMKE employees, contractors, volunteers, partners, affiliates, and other related personnel constitute acts of gross misconduct and are therefore grounds for disciplinary action, up to and including termination of employment. Receipt of allegations of SEA by μαμαγαία / mamagea AMKE personnel therefore require appropriate response with the aim of providing adequate support to survivors, investigating allegations for disciplinary action, and preventing recurrence of such misconduct. Upon receiving an allegation of sexual exploitation and abuse, the PSEA Focal Person (FP) will take immediate action as follows:

- Complete an Incident Report Form on SEA, if one has not already been completed. In completing the Incident Report Form on SEA, the FP shall:
- Use the complainant’s own wording to describe facts, violations and persons involved in the case.
- Indicate where relevant information is missing and add essential contextual information where needed.
- Remember that their role is not to investigate but rather to relate the facts for others to follow-up.
- If urgent safety concerns are identified by the FP, these, along with any actions taken, must be reported without delay to [Senior Management Team/Board].
- In managing urgent safety concerns, the FP shall remain mindful of the obligation to maintain confidentiality and protect the identity of the parties named in the allegation.
- If the FP receives the SEA disclosure directly from the victim, the FP shall listen, support and promptly refer the victim to relevant services of their

choice, with their consent or the consent of a caregiver or guardian in the case of a minor, using GBV/Child Protection referral pathways.

- The FP shall also be able to provide guidance to the victim on “what comes next” and what will happen with the report, while at the same time, notify the Senior Management Team of the receipt of an allegation and provide them with a copy of the Incident Report Form on SEA.
 - Any documentation relating to the complaint, including the Incident Report Form on SEA, must be transmitted in a strictly confidential manner in accordance with μαμαγαία / mamagea AMKE Data Protection Policy. The obligation of confidentiality continues after the matter has been closed.
1. If the allegation concerns a member of the Senior Management Team, the FP shall avoid transmitting the allegation to the Senior Management Team as a whole, and instead identify a trusted member to receive the allegation. Otherwise, all complaints must be reviewed by the Senior Management Team but not all will require a formal investigation process.
 2. In deciding whether an investigation is required, the Senior Management Team shall consider whether the alleged behaviour violates one or more of the following standards:
 - μαμαγαία / mamagea AMKE Code of Conduct / Policy on Prevention of Sexual Exploitation and Abuse or other element of the organization’s rules and regulations.
 - National laws on sexual misconduct;
 - The initial assessment should also establish whether there is a reasonable likelihood that an investigation could reveal sufficient evidence to prove or refute the allegations, the credibility of the allegation, (whether there is a reasonable factual basis that the misconduct occurred)”, the availability of evidence and witnesses; verifiability of the information received, and risk(s) for the victim(s) associated with the investigation process.
 3. In general, organizations should always keep a written record explaining the rationale for their course of action, including where a decision is taken to close a case without initiating a full investigation; this is particularly useful if



they decide to revisit the case at a later stage or if a report is subsequently made against the same alleged perpetrator

4. If there is not sufficient information for the Senior Management Team to make a decision, they may decide to conduct a preliminary investigation to gather relevant information to take forward the complaint.
5. This preliminary investigation shall be brief and aim only to gather the necessary information to make a decision whether to initiate a full investigation.
6. The Senior Management Team will convene within 48 hours of receipt of an allegation and make a decision as to whether to investigate within 3 days of receipt of the allegation.
7. Upon completion of the investigation, partners should also “promptly provide reports on the outcome of the investigations” and if requested, share “any relevant details... and evidence... for examination and further use by UNICEF” to the extent legally possible.
8. In cases where competent national authorities are conducting (or have conducted) the investigation, UNICEF may relieve the partner of its contractual obligation to conduct an internal investigation. In those cases, partners should, as far as legally possible, support UNICEF in obtaining information on the status and outcome of the investigation.